2 3 4 5 6 7 8 9 10	LAUREN GALLO WHITE, SBN 309075 SAMANTHA A. MACHOCK, SBN 298852 WILSON SONSINI GOODRICH & ROSATI Professional Corporation One Market Plaza, Spear Tower, Suite 3300 San Francisco, CA Telephone: (415) 947-2000 Facsimile: (415) 947-2099 Email: lwhite@wsgr.com Email: smachock@wsgr.com CHRISTOPHER CHIOU, SBN 233587 WILSON SONSINI GOODRICH & ROSATI Professional Corporation 633 West Fifth Street Los Angeles, CA 90071.2048 Telephone: (323) 210-2900 Facsimile: (866) 974-7329 Email: cchiou@wsgr.com Attorneys for Defendants YOUTUBE, LLC, GOOGLE LLC and	BRIAN M. WILLEN WILSON SONSINI GOODRICH & ROSATI Professional Corporation 1301 Avenue of the Americas, 40th Floor New York, NY 10019-6022 Telephone: (212) 999-5800 Facsimile: (212) 999-5801 Email: bwillen@wsgr.com		
12	ALPHABET INC.			
13				
14	UNITED STATES DISTRICT COURT			
15	NORTHERN DISTRICT OF CALIFORNIA			
16	SAN FRANCISCO DIVISION			
17				
18	IN RE: SOCIAL MEDIA ADOLESCENT	MDL No. 3047		
19	ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION	CASE NO.: 4:22-md-03047-YGR		
20		Honorable Thomas S. Hixson		
21	This Filing Relates to:	STIPULATED REQUEST FOR		
22		ORDER CHANGING TIME (ESI PROTOCOL)		
23	ALL ACTIONS	·		
24				
25				
26				
20 27				
28				

CASE No.: 4:22-MD-03047-YGR

STIPULATED REQUEST FOR ORDER CHANGING TIME

	2
	3
	4
	5
	6
	7
	8
	9
l	0
l	1
l	2
l	3
l	4
l	5
l	6
l	7
l	8
l	9
2	0
2	1

Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadline to file a proposed ESI Protocol or letter briefing on disputes regarding that order to August 10, 2023. The parties declare in support of this request:

- 1. Pursuant to Case Management Order No. 5 (Dkt. 164), the parties are currently negotiating a proposed ESI Protocol;
- 2. The parties previously stipulated to extend the deadline to file a joint proposed ESI Protocol or letter briefing on disputes regarding that order, with the current deadline being July 13, 2023;
- The parties have continued to work diligently to eliminate or narrow disputes 3. over a proposed ESI Protocol, including by exchanging drafts and letters, and through a series of ongoing meet-and-confers;
 - 4. The parties agree that, given the number of issues they are negotiating with respect to the ESI Protocol, they would benefit from more time to continue their conferrals and attempt to narrow the disputes they ask the Court to resolve, and seek an extension until August 10 to afford time for such negotiations;
- 5. Extending this deadline will not affect any other deadline affixed by the Court.

THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully request that the Court extend the deadline to submit a joint proposed ESI Protocol or letter briefing regarding disputes over that order to August 10, 2023.

IT IS SO STIPULATED AND AGREED.

22

23

Dated: July 12, 2023

24

25

26

27

28

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI **Professional Corporation**

/s/ Lauren Gallo White

Lauren Gallo White Wilson Sonsini Goodrich & Rosati lwhite@wsgr.com Samantha A. Machock

1	smachock@wsgr.com One Market Plaza, Spear Tower, Suite 3300
2	San Francisco, CA 94105
,	Telephone: (415) 947-2000
3	Facsimile: (415) 947-2099
4	Brian M. Willen
5	Wilson Sonsini Goodrich & Rosati
	bwillen@wsgr.com
6	1301 Avenue of the Americas, 40th Floor
7	New York, New York 10019
´	Telephone: (212) 999-5800
8	Facsimile: (212) 999-5899
9	Christopher Chiou
	Wilson Sonsini Goodrich & Rosati
10	cchiou@wsgr.com
	633 West Fifth Street
11	Los Angeles, CA 90071-2048
12	Telephone: (323) 210-2900
_	Facsimile: (866) 974-7329
13	
	Attorneys for Defendants YouTube, LLC,
14	Google LLC, and Alphabet Inc.
15	
	/s/ Christopher L. Ayers
16	CHRISTOPHER A. SEEGER
	CHRISTOPHER L. AYERS
17	SEEGER WEISS, LLP
18	55 CHALLENGER ROAD, 6TH FLOOR
10	DIDCEELELD DADIZ NI 07//0
	RIDGEFIELD PARK, NJ 07660
19	Telephone: + 1 (973) 639-9100
	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656
	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656 Email: cseeger@seegerweiss.com
20	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656
20 21	Telephone: +1 (973) 639-9100 Facsimile: +1 (973) 679-8656 Email: cseeger@seegerweiss.com Email: cayers@seegerweiss.com
20 21	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656 Email: cseeger@seegerweiss.com Email: cayers@seegerweiss.com LEXI J. HAZAM
20 21 22	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656 Email: cseeger@seegerweiss.com Email: cayers@seegerweiss.com LEXI J. HAZAM LIEFF CABRASER HEIMANN &
20 21 22	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656 Email: cseeger@seegerweiss.com Email: cayers@seegerweiss.com LEXI J. HAZAM LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
20 21 22 23	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656 Email: cseeger@seegerweiss.com Email: cayers@seegerweiss.com LEXI J. HAZAM LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 BATTERY STREET, 29TH FLOOR
20 21 22 23 24	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656 Email: cseeger@seegerweiss.com Email: cayers@seegerweiss.com LEXI J. HAZAM LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 BATTERY STREET, 29TH FLOOR SAN FRANCISCO, CA 94111-3339
20 21 22 23 24	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656 Email: cseeger@seegerweiss.com Email: cayers@seegerweiss.com LEXI J. HAZAM LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 BATTERY STREET, 29TH FLOOR
20 21 22 23 24 25	Telephone: +1 (973) 639-9100 Facsimile: +1 (973) 679-8656 Email: cseeger@seegerweiss.com Email: cayers@seegerweiss.com LEXI J. HAZAM LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 BATTERY STREET, 29TH FLOOR SAN FRANCISCO, CA 94111-3339 Telephone: +1 (415) 956-1000 Email: lhazam@lchb.com
220 221 222 223 224 225 226 226	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656 Email: cseeger@seegerweiss.com Email: cayers@seegerweiss.com LEXI J. HAZAM LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 BATTERY STREET, 29TH FLOOR SAN FRANCISCO, CA 94111-3339 Telephone: + 1 (415) 956-1000 Email: lhazam@lchb.com
220 221 222 223 224 225 226 226	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656 Email: cseeger@seegerweiss.com Email: cayers@seegerweiss.com LEXI J. HAZAM LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 BATTERY STREET, 29TH FLOOR SAN FRANCISCO, CA 94111-3339 Telephone: + 1 (415) 956-1000 Email: lhazam@lchb.com PREVIN WARREN MOTLEY RICE LLC
19 20 21 22 22 23 24 25 26 27 28	Telephone: + 1 (973) 639-9100 Facsimile: + 1 (973) 679-8656 Email: cseeger@seegerweiss.com Email: cayers@seegerweiss.com LEXI J. HAZAM LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 BATTERY STREET, 29TH FLOOR SAN FRANCISCO, CA 94111-3339 Telephone: + 1 (415) 956-1000 Email: lhazam@lchb.com

1	Telephone: + 1 (202) 386-9610 Email: pwarren@motleyrice.com
2	Co-Lead Counsel
3	
4	JENNIE LEE ANDERSON ANDRUS ANDERSON, LLP
5	155 MONTGOMERY STREET, SUITE 900
6	SAN FRANCISCO, CA 94104 Telephone: + 1 (415) 986-1400
7	Email: jennie@andrusanderson.com
8	Liaison Counsel
9	JOSEPH G. VANZANDT
	BEASLEY ALLEN CROW METHVIN
10	PORTIS & MILES, P.C.
11	234 COMMERCE STREET
	MONTGOMERY, AL 36103
12	Telephone: + 1 (334) 269-2343
13	Email: joseph.vanzandt@beasleyallen.com
	EMILY C. JEFFCOTT
14	MORGAN & MORGAN
15	220 W. GARDEN STREET, 9TH FLOOR
	PENSACOLA, FL 32502
16	Telephone: + 1 (850) 316-9100
17	Email: ejeffcott@forthepeople.com
	RON AUSTIN
18	RON AUSTIN LAW
19	400 Manhattan Blvd.
19	Harvey LA, 70058
20	Telephone: + 1 (504) 227–8100
$_{21}$	Email: raustin@ronaustinlaw.com
22	MATTHEW BERGMAN
²	GLENN DRAPER
23	SOCIAL MEDIA VICTIMS LAW CENTER
	821 SECOND AVENUE, SUITE 2100
24	SEATTLE, WA 98104
25	Telephone: +1 (206) 741-4862
	Email: matt@socialmediavictims.org Email: glenn@socialmediavictims.org
26	JAMES J. BILSBORROW
27	WEITZ & LUXENBERG, PC
28	700 BROADWAY
_	

1 2	NEW YORK, NY 10003 Telephone: + 1 (212) 558-5500 Facsimile: + 1 (212) 344-5461 Email: jbilsborrow@weitzlux.com
3	·
4	PAIGE BOLDT WATTS GUERRA LLP
5	4 Dominion Drive, Bldg. 3, Suite 100
6	San Antonio, TX 78257 Telephone: + 1 (210) 448-0500
7	Email: PBoldt@WattsGuerra.com
8	THOMAS P. CARTMELL
9	WAGSTAFF & CARTMELL LLP 4740 Grand Avenue, Suite 300
10	Kansas City, MO 64112
11	Telephone: + 1 (816) 701 1100 Email: tcartmell@wcllp.com
12	JAYNE CONROY
13	SIMMONS HANLY CONROY, LLC
	112 MADISON AVE, 7TH FLOOR NEW YORK, NY 10016
14	Telephone: + 1 (917) 882-5522 Email: jconroy@simmonsfirm.com
15	
16	CARRIE GOLDBERG C.A. GOLDBERG, PLLC
17	16 Court St.
18	Brooklyn, NY 11241 Telephone: + 1 (646) 666-8908
19	Email: carrie@cagoldberglaw.com
20	KIRK GOZA
21	GOZA & HONNOLD, LLC 9500 Nall Avenue, Suite 400
22	Overland Park, KS 66207
23	Telephone: + 1 (913) 451-3433 Email: kgoza@gohonlaw.com
24	SIN-TINY MARY LIU
25	AYLSTOCK WITKIN KREIS &
	OVERHOLTZ, PLLC 17 EAST MAIN STREET, SUITE 200
26	PENSACOLA, FL 32502
27	Telephone: + 1 (510) 698-9566 Email: mliu@awkolaw.com
28	

1	ANDRE MURA
2	GIBBS LAW GROUP, LLP 1111 BROADWAY, SUITE 2100
,	OAKLAND, CA 94607
3	Telephone: + 1 (510) 350-9717
4	Email: amm@classlawgroup.com
5	EMMIE PAULOS
6	LEVIN PAPANTONIO RAFFERTY 316 SOUTH BAYLEN STREET, SUITE 600
7	PENSACOLA, FL 32502
	Telephone: +1 (850) 435-7107
8	Email: epaulos@levinlaw.com
9	ROLAND TELLIS
10	DAVID FERNANDES
10	BARON & BUDD, P.C.
11	15910 Ventura Boulevard, Suite 1600
	Encino, CA 91436
12	Telephone: +1 (818) 839-2333
13	Facsimile: +1 (818) 986-9698
13	Email: rtellis@baronbudd.com
14	Email: dfernandes@baronbudd.com
15	ALEXANDRA WALSH
	WALSH LAW
16	1050 Connecticut Ave, NW, Suite 500
1.7	Washington D.C. 20036
17	Telephone: +1 (202) 780-3014
18	Email: awalsh@alexwalshlaw.com
19	MICHAEL M. WEINKOWITZ
	LEVIN SEDRAN & BERMAN, LLP
20	510 WALNUT STREET
21	SUITE 500
41	PHILADELPHIA, PA 19106
22	Telephone: + 1 (215) 592-1500 Email: mweinkowitz@lfsbalw.com
,,	Eman. mwemkowitz@nsoaiw.com
23	DIANDRA "FU" DEBROSSE ZIMMERMANN
24	DICELLO LEVITT
	505 20th St North
25	Suite 1500
26	Birmingham, Alabama 35203
ا ۵۷	Telephone: +1 (205) 855-5700
27	Email: fu@dicellolevitt.com
	DODEDT II VI ONOFE
28	ROBERT H. KLONOFF

1		ROBERT KLONOFF, LLC
2		2425 SW 76TH AVENUE
		PORTLAND, OR 97225
3		Telephone: + 1 (503) 702-0218 Email: klonoff@usa.net
		Eman. kionon@usa.net
4		HILLARY NAPPI
5		HACH & ROSE LLP
		112 Madison Avenue, 10th Floor
6		New York, New York 10016
7		Telephone: +1 (212) 213-8311
		Email: hnappi@hrsclaw.com
8		ANTHONY K. BRUSTER
9		BRUSTER PLLC
		680 N. Carroll Ave., Suite 110
10		Southlake, TX 76092
11		Telephone: + 1 (817) 601-9564
11		Email: akbruster@brusterpllc.com
12		
13		FRANCOIS M. BLAUDEAU, MD JD FACHE
15		FCLM SOUTHERN INSTITUTE FOR MEDICAL
14		AND LEGAL AFFAIRS
15		2762 B M Montgomery Street, Suite 101
13		Homewood, Alabama 35209
16		Telephone: + 1 (205) 564-2741
		Email: francois@southernmedlaw.com
17		IAMEG MARCH
18		JAMES MARSH MARSH LAW FIRM PLLC
		31 HUDSON YARDS, 11TH FLOOR
19		NEW YORK, NY 10001-2170
20		Telephone: +1 (212) 372-3030
		Email: jamesmarsh@marshlaw.com
21		
22		Attorneys for Plaintiffs
23		COVINGTON & BURLING LLP
24		/s/ Phyllis A. Jones
		Phyllis A. Jones, pro hac vice
25		Paul W. Schmidt, pro hac vice
26		COVINGTON & BURLING LLP
		One CityCenter 850 Tenth Street, NW
27		Washington, DC 20001-4956
28		Telephone: + 1 (202) 662-6000
د د		Facsimile: +1 (202) 662-6291
	STIPLILATED REQUEST FOR ORDER CHANGING TIME	-6- CASE NO · 4·22-MD-03047-YG

1		Email: paj	ones@cov.com
			hmidt@cov.com
2		F '1 I 1	H (G) (D N 2(0492)
3		•	nson Henn (State Bar. No. 269482) FON & BURLING LLP
,			amino Real
4			o Square, 10th Floor
5		Palo Alto,	<u>-</u>
			: + 1 (650) 632-4700
6			+1 (650) 632-4800
7		Email: ehe	nn@cov.com
0		Attorney fo	or Defendants Meta Platforms, Inc.
8			book, Inc.; Facebook Holdings, LLC;
9		•	Operations, LLC; Facebook
			Inc.; Facebook Technologies, LLC;
10		•	LLC; Siculus, Inc.; and Mark Elliot
11		Zuckerberg	g
12			
12			SPALDING LLP
13			Geoffrey M. Drake
14		Geoffrey N	
14			palding LLP
15		Atlanta, G.	htree Street, NE, Suite 1600
			: + 1 (404) 572-4600
16		-	+ 1 (404) 572-5100
17			ake@kslaw.com
18			
10		FAEGRE	DRINKER LLP
19		/s/ A	ndrea Roberts Pierson
20			berts Pierson
-		Faegre Dri	
21			eridian Street, Suite 2500
22			is, IN 46204 : + 1 (317) 237-0300
			+1 (317) 237-0300
23			lrea.pierson@faegredrinker.com
24		4	
			for Defendants TikTok Inc. and
25		ByteDance	z IIIC.
26		MITALOPE	TOLLEG & OLGONILE
27			R, TOLLES & OLSON LLP Sonathan H. Blavin
			I. Blavin, SBN 230269
28			, TOLLES & OLSON LLP
	STIPULATED REQUEST FOR ORDER CHANGING TIME	-7-	CASE No.: 4:22-MD-03047-YGR

1 2 3	560 Mission Street, 27th Floor San Francisco, CA 94105-3089 Telephone: (415) 512-4000 Facsimile: (415) 512-4077
4	Rose L. Ehler (SBN 29652)
5	Victoria A. Degtyareva (SBN 284199) Ariel T. Teshuva (SBN 324238)
6	MUNGER, TOLLES & OLSON LLP 350 South Grand Avenue, 50th Floor
7	Los Angeles, CA 90071-3426 Telephone: (213) 683-9100
8	Facsimile: (213) 687-3702
9	Lauren A. Bell, <i>pro hac vice</i> MUNGER, TOLLES & OLSON LLP
10	601 Massachusetts Ave., NW St., Suite 500 E
11	Washington, D.C. 20001-5369
12	Telephone: (202) 220-1100
13	Facsimile: (202) 220-2300
14	Attorneys for Defendant Snap Inc.
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

1	ATTESTATION
2	I, Lauren Gallo White, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the
3	concurrence to the filing of this document has been obtained from each signatory thereto.
4	Dated: July 12, 2023
5	/s/ Lauren Gallo White
6	Lauren Gallo White
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	